

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

JULIE SPRAFKA,

Plaintiff,

v.

DEPUY ORTHOPAEDICS, INC., an
Indiana Corporation, and MEDICAL
DEVICE BUSINESS SERVICES, INC.,
an Indiana Corporation,

Defendant.

Case No. 0:22-cv-00331 (DWF/TNL)

**DECLARATION OF ERIN M. PAULEY
IN SUPPORT OF DEFENDANT’S
MOTION TO STRIKE THE REPORT
OF PLAINTIFF’S EXPERT,
TARUN GOSWAMI, D. Sc., FIE**

DECLARATION OF ERIN M. PAULEY

I, ERIN M. PAULEY, an attorney duly admitted *pro hac vice* to practice law in this Court, declare as follows:

1. I am an Attorney with the law firm of Barnes & Thornburg LLP, attorneys for Defendant Medical Device Business Services, Inc. (formerly known as DePuy Orthopaedics, Inc.) (“MDBS”), in the above-referenced litigation.

2. I submit this Declaration in support of MDBS’s Motion to Strike the Report of Plaintiff’s Expert, Tarun Goswami, D. Sc., FIE. I have personal knowledge of the following facts set forth in this Declaration and, if called as a witness, I could and would competently testify as to the matters stated herein.

3. The deposition of Plaintiff Julie Sprafka was completed on November 10, 2022, the deposition of Plaintiff’s implanting surgeon, Dr. Andrea Saterbak, was completed on February 22, 2023, the deposition of Plaintiff’s revising surgeon, Dr. Kristoffer Breien, was completed on May

10, 2023, and the deposition of MDBS's Rule 30(b)(6) witnesses were completed on June 21, 2023 and June 22, 2023.

4. The deposition of Plaintiff's previously disclosed expert, Mari Truman, M.S., P.E., is expected to be completed on August 2, 2023.

5. The deposition of MDBS's expert Michael Ries, M.D., Sc.M, is noticed for August 4, 2023.

6. The deposition of MDBS's expert Chantal E. Holy, Ph.D., MSc., is noticed for August 9, 2023.

7. Annexed hereto as **Exhibit A** is a true and correct copy of Plaintiff's March 10, 2023 Rule 26(a)(2) Disclosure of Mari Truman, M.S., P.E.

8. Annexed hereto as **Exhibit B** is a true and correct copy of Plaintiff's June 30, 2023 Rule 26(a)(2) Disclosure of Tarun Goswami, D. Sc., FIE.

9. Annexed hereto as **Exhibit C** is a true and correct copy of the expert report of Plaintiff's expert Tarun Goswami, D. Sc., FIE.

10. Annexed hereto as **Exhibit D**, is a true and correct copy of the expert report of Plaintiff's expert Mari Truman, M.S., P.E.

I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct.

Dated: August 2, 2023

/s/ Erin M. Pauley